

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: **Amin Husni Yousef**

No. 20-11115

Debtor

Chapter 13

Objecting Party: Goji Systems, Inc.

OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

1. Plan not proposed in good faith. 11 U.S.C. § 1325(a)(3)
2. The plan is not feasible. 11 U.S.C. § 1325(a)(6)
3. Debtor has failed to list in any schedules or other bankruptcy filings certain computer and computer-related hardware (KIOSK hardware) in his possession that is owned by Objecting Party, including but not limited to 2x Screens, 2x PinPads, 2x Printers, and 2x Network Switches, which were unlawfully removed from Debtor's LLC's business premises prior to the instant bankruptcy and which were required to be returned by Debtor to Objecting Party prior to the filing of the instant bankruptcy. Debtor is unlawfully holding such property and has failed and refused to return it. Debtor violated applicable Bankruptcy Rules and applicable law by (a) failing to disclose in his filings that Debtor was holding and/or in possession of property owned by Objecting Party; (b) failing to list Objecting Party as a creditor or other party in interest; (a) failing to include Objecting Party on the matrix; (c) otherwise failing to notify Objecting Party of the instant bankruptcy; (d) failing and refusing to return Objecting Party's property to it or providing in his plan such return; (e) to the extent that any of Objecting Party's property is generally included in Debtor's schedules as used computer equipment, misrepresenting Debtor's ownership in such property, failing to list Objecting Party as owner, improperly listing the value of such property and improperly claiming such property as exempt. Objecting Party is entitled to receive a return of property owned by it and the Chapter 13 Plan does not provide for such return.

/s/ Mark A. Haas, Esquire

HWANG & HAAS, PC
Mark A. Haas, Esquire
Attorney I.D. No. 37367
325 Sentry Parkway, Bldg. 5W, Suite 200
Blue Bell, PA 19422
610-680-2319
mhaas@hwanglegal.com